



Esere J. Onaodowan, Esq.

eonaodowan@eocdlaw.com t 646.375.2119 c 718.427.3139

Christine E. Delince, Esq.

cdelince@eocdlaw.com t 646.375.2117 c 917.238.9332

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VIA ECF

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

10/15/2020

Bail is modified as requested.

Mr. Toomer may attend his
son's party on October 31,
2020 from 3:30 PM - 9 PM. SO
ORDERED

RE: *United States v. Morris Toomer* 20 Cr. 132 (PAC)
Temporary Modification of Bail conditions

Dear Judge Crotty:

I represent Mr. Morris Toomer in the above referenced matter. We write to respectfully request that the bail conditions set by Magistrate Judge Sarah L. Cave on February 26, 2020 be temporarily modified for Mr. Toomer to be able to attend his two-year-old son's birthday party. His son, Maddox Seven Toomer, is turning two years old and the family is organizing a costume birthday party for the baby. The party will be on Saturday, October 31, 2020 from 3:30pm-9pm at 229 W. 135th Street, New York, New York 10030.

Mr. Toomer understands that should Your Honor permit him to attend his son's birthday party on October 31, 2020 from 3:30pm – 9pm, he is only permitted to attend the birthday party and no other social events. He understands that he will not be drinking or part-taking in any illicit substances. He will leave his home only to attend the birthday party and to do nothing else. Once the party has ended, he will promptly return to his home and notify pretrial services that he is at home. After the birthday party, Mr. Toomer understands that he will resume compliance with the previously set conditions of his release.

I have spoken with the Government and the Government has no objection to this request.

For those reasons, Your Honor's immediate attention is appreciated.

Respectfully submitted,

Esere J. Onaodowan, Esq.

CC via email: AUSA Juliana Murray